

February 6, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: EB-06-TC-060 and EB Docket No. 06-36

**CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006)**

Dear Ms. Dortch:

Included herein is the Compliance Certificate for Working Assets Funding Service, Inc. ("WAFS"). If you have any questions, please call Walter McGee, Senior Regulatory Manager, at (415) 369-2084.

Sincerely,

/s/

Walter N. McGee  
Senior Regulatory Manager

## 2006 CPNI COMPLIANCE CERTIFICATE

I, Eileen Bayers, based upon my own personal knowledge, affirm that Working Assets Funding Service, Inc. has established adequate operating procedures to ensure compliance with CFR 47, Part 64, Subpart U, "Customer Proprietary Network Information". Attached to this Certificate is a "Statement of CPNI Procedures" explaining how the Company's operating procedures ensure compliance with Subpart U.

Signed January 31, 2006

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/s/

Eileen Bayers  
Vice President of Marketing

**STATEMENT OF CPNI PROCEDURES**  
**FOR**  
**WORKING ASSETS FUNDING SERVICE, INC.**

**Telemarketing**

Working Assets Funding Service, Inc. ("WAFS") outbound telemarketing is performed solely by outside vendors. Customer privacy and compliance with CPNI regulations are achieved by providing only minimum customer information, none of which is CPNI, to telemarketing vendors.

**Employee Access and Training**

Employees are trained that customer information is confidential and private. Only those employees needing access to perform their duties are able to use the database containing this information. Each employee having access is trained not to divulge customer information to any third party except the customer and consultants/vendors (*e.g.*, outside vendors perform billing services for WAFS). All consultants/vendors sign non-disclosure agreements restricting the use of customer information to only the purpose of their engagement by WAFS.

**Provision of Information to Customers**

Except for the provision of customer information in response to a subpoena, customer information is only provided to third parties as described above. To ensure that a customer request for CPNI is only provided to that customer, Customer Representatives are trained to mail the requested information only to the service or billing address of the account. Information may also be faxed to a customer's work location if the customer can correctly answer three security questions based upon the customer's account information.